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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PERNON DUNSTON,

Civil Action No.: 1:21-cv-02345-PKC-RML

Plaintiff,

NOTICE OF MOTION Refer to Hon. Pamela K. Chen

- against -

PATRICIA DUNSTON, AS THE PROPOSED ESTATE REPRESENTATIVE OF SAMUEL DUNSTON, Deceased, PATRICIA DUNSTON, Individually, SONYA DUNSTON, REGINA FELTON, ESQ., MARCOS SMITH, DESMOND SCOTT, THE NUMBER ONE STAR MANAGEMENT CORP., DEKALB FUNERAL SERVICES, INC., NATIONAL ALLOTMENT INSURANCE AGENCY, LTD. AND ITS SUCCESSORS and FELTON & ASSOCIATES,

Detendants.	
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PLEASE TAKE NOTICE that, upon the annexed affidavit of JACK ANGELOU, ESQ., dated June 29, 2021, the exhibits annexed thereto and all prior proceedings held in this matter, Plaintiff's counsel will move this Court, to be held at the Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on a date to be issued by this Court, for an Order:

- 1. Pursuant to Local Civil Rule 1.4 and the New York Rules of Professional Conduct Rule 1.16, permitting counsel to withdraw as attorney of record for the Plaintiff, and
- For such other and further relief that may seem just and proper to the Court.

PLEASE TAKE NOTICE, that answering affidavits, if any, are to be served upon the undersigned at such time as this Court may direct.

Dated: Brooklyn, New York June 29, 2021

Yours, etc.

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JACK ANGELOU, ESO

Held & Hines, L.L.P. Attorneys for Plaintiffs

2004 Ralph Avenue Brooklyn, New York 1234

(718) 531-9700

To:

Pernon Dunston, Plaintiff

Regina Felton, Esq. Attorney for Defendant Felton & Associates 1371 Fulton Street Brooklyn, New York 11216

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DESMOND SCOTT 491 Dekalb Avenue Brooklyn, New York 11205

MARCOS SMITH 491 Dekalb Avenue Brooklyn, New York 11205

NATIONAL ALLOTMENT INSURANCE AGENCY, LTD. 491 Dekalb Avenue, Apt 2 Brooklyn, New York 11205

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